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6 Attorneys for Defendant
7 TRULITE GLASS AND ALUMINUM SOLUTIONS, LLC

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

11 MELINDA GREEN,
12 Plaintiff,

13 vs.

14 TRULITE GLASS AND ALUMINUM
15 SOLUTIONS, LLC, a Foreign
16 Corporation, DOES I-X; ROE
CORPORATIONS I-X,
17 Defendant.

Case No. 2:18-CV-00119-JCM-PAL

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME FOR DEFENDANT'S
RESPONSE TO PLAINTIFF'S COMPLAINT
[FIRST REQUEST]**

19 Plaintiff MELINDA GREEN ("Plaintiff") and Defendant TRULITE GLASS &
20 ALUMINUM SOLUTIONS, LLC ("Defendant"), by and through their undersigned counsel, hereby
21 agree and stipulate to extend the time for Defendant to file its response to Plaintiff's Complaint, one
22 month, from its current deadline of **February 20, 2018** up to and including **March 20, 2018**.

23 Defendant's counsel was only recently retained to represent Defendant in this matter.
24 Furthermore, Defendant was also recently served with a Complaint in *Kirk v. Trulite Glass &*
25 *Aluminum Solutions, LLC et al*, Case No. 2:18-cv-00043-JCM-GWF, in which the plaintiff and
26 Defendant are represented by the same counsel as Plaintiff and Defendant are in this case, with an
27 approaching March 6, 2018 response deadline, requiring the time and attention of Defendant and its
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1 counsel. This extension is therefore being requested in order to give Defendant necessary additional
2 time, given the pendency of the *Kirk* matter, to look into Plaintiff's allegations and conduct the
3 required diligence necessary to prepare and file their response to the Complaint.

4 This is the first request for an extension of time to respond to the Complaint. This request is
5 made in good faith and not for the purpose of delay.

6 Dated: February 12, 2018

Dated: February 12, 2018

7 Respectfully submitted,

Respectfully submitted,

9 /s/ Jenny L. Foley

10 JENNY L. FOLEY, PH.D., ESQ.
HKM EMPLOYMENT ATTORNEYS
11 LLP

12 Attorney for Plaintiff
MELINDA GREEN

/s/ Timothy W. Roehrs

10 MONTGOMERY Y. PAEK, ESQ.
TIMOTHY W. ROEHRS, ESQ.
11 LITTLER MENDELSON, P.C.

12 Attorneys for Defendant
TRULITE GLASS AND ALUMINUM
13 SOLUTIONS, LLC

14 **ORDER**

15 **IT IS SO ORDERED.**

16 Dated: February 15, 2018.

19 
20 UNITED STATES DISTRICT/MAGISTRATE
21 JUDGE

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